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UNITE

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PRO-TECT SECURITY SERVICES, LLC, a Nevada Limited Liability Company,)	Civil Action No. 2:17-cv-01685-JAD-NJk
Plaintiff,)	
v.)	
INTEGRATED SYSTEM IMPROVEMENT SERVICES, INC. d/b/a SPECIAL INTELLIGENCE SERVICE, an Arizona Corporation.)))	
Defendant.)	

STIPULATION AND ORDER TO CONTINUE FEDERAL RULE 26(f) CONFERENCE (THIRD REQUEST)

Plaintiff Pro-Tect Security Services, LLC by and through its counsel of record, Gary E. Schnitzer, Esq. and Adam Wax, Esq. of the law firm Kravitz, Schnitzer & Johnson, Chtd., and Integrated Systems Improvement Services Inc. d/b/a Special Intelligence Services, by and through its counsel of record, Michael D. Rawlins, Esq. of the law firm Durham Jones & Pinegar, hereby stipulate and agree to extend the Federal Rule 26(f) conference deadline for an additional 30 days, to November 27, 2017.

This request is made to allow counsel to continue to investigate a possible conflict of interest. Plaintiff's principal has used defendant's counsel's firm for legal services, and plaintiff's counsel has raised the issue whether defendant's counsel has a conflict of interest. Counsel for the Parties have exchanged several correspondences in

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hopes of reaching a resolution regarding whether defendant's counsel has a conflict of interest as the parties would like to resolve this issue prior to a Rule 26(f) conference.

Recently, plaintiff's counsel determined that the Complaint should be amended to substitute Trade Show Services, Ltd. dba Pro-Tect Security Services for the original plaintiff Pro-Tect Security Services, LLC. Defendants have consented to the substitution, and the substitution requires the parties to re-evaluate the conflicts issues, as a new party is now involved.

This is the third request. This request is necessary as Counsel have concluded there is a need to continue the conference deadline from October 27, 2017, to November 27, 2017 to allow the parties to further explore and to make informed decisions about the conflicts issue. The parties believe that sharing of information and consultation with conflicts counsel is prudent at this time, which is currently ongoing. If the parties are unable to come to an agreement, it is possible that a motion for disqualification will be filed by plaintiff.

This extension is made for good cause and not for purposes of delay.

IT IS SO AGREED AND STIPULATED.

KRAVITZ, SCHNITZER & JOHNSON

DURHAM JONES & PINEGAR

By <u>/s/ Adam J. Wax, Esq.</u>

Gary E. Schnitzer, Esq NV Bar No.395 Adam J. Wax, Esq. NV Bar No. 12126 8985 S. Eastern Ave., Suite 200 Las Vegas, NV 89123

Attorneys for Plaintiff
IT IS SO ORDERED.

Dated: October 23, 2017

By /s/ Michael D. Rawlins, Esq.

Michael D. Rawlins NV Bar No. 5467

10785 W. Twain Ave., Suite 200

Las Vegas, NV 89135 Attorneys for Defendant

UNITED STATES MAGISTRATE JUDGE